

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

ALYSON BOTTONI, Derivatively on  
Behalf of FLUOR CORPORATION,

Plaintiff,

V.

CARLOS M. HERNANDEZ, D.  
MICHAEL STEUERT, ROBIN K.  
CHOPRA, MATTHEW J. MCSORLEY,  
PETER J. FLUOR, ALAN L.  
BOECKMANN, PETER K. BARKER,  
ROSEMARY T. BERKERY, ALAN M.  
BENNETT, ARMANDO J. OLIVERA,  
DEBORAH D. MCWHINNEY,  
MATTHEW K. ROSE, JAMES T.  
HACKETT, DAVID E. CONSTABLE,  
THOMAS C. LEPPERT, DAVID T.  
SEATON, BRUCE A. STANSKI, BIGGS  
C. PORTER, GARY G. SMALLEY,  
NADER H. SULTAN, LYNN C.  
SWANN, SAMUEL J. LOCKLEAR III,  
and JOSEPH W. PRUEHER.

## Defendants,

-and-

**FLUOR CORPORATION, a Delaware  
Corporation,**

## Nominal Defendant.

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Lead Case No. 3:20-CV-01442-X

(Consolidated with Case Nos. 3:20-CV-01558-X and 3:21-CV-00353-X)

**PLAINTIFF JOAN GOODMAN'S MOTION TO APPOINT LEAD PLAINTIFF  
AND APPROVE PLAINTIFF'S SELECTION OF LEAD COUNSEL**

Pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, and to facilitate the efficient coordination of related shareholder litigation, Plaintiff Joan Goodman (“Plaintiff”) respectfully moves this Court for entry of an Order:

1. Designating the current master file for the consolidated derivative actions, *Bottoni v. Hernandez*, No. 3:20-cv-01442, as *In re Fluor Corporation Derivative Litigation* (the “Consolidated Shareholder Derivative Litigation”);
2. Appointing Plaintiff as Lead Plaintiff in the Consolidated Shareholder Derivative Litigation;
3. Appointing Scott+Scott Attorneys at Law LLP as Lead Counsel in the Consolidated Shareholder Derivative Litigation; and
4. Granting such other and further relief as the Court deems just and proper.

In support of this motion, Plaintiff submits an accompanying memorandum, the Declaration of Scott R. Jacobsen (with exhibits attached thereto), and a proposed order and will rely on all papers and proceedings in the Consolidated Shareholder Derivative Litigation.

Dated: May 10, 2021

Respectfully submitted,

**SCOTT+SCOTT ATTORNEYS AT LAW LLP**

/s/ Scott R. Jacobsen

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*Proposed Lead Counsel for Proposed  
Lead Plaintiff Joan Goodman*

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*Local Counsel for Proposed Lead Plaintiff Joan  
Goodman*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of May, 2021, the foregoing document was filed using the Court's CM/ECF system. In addition, (1) the filing is available for viewing and downloading via the CM/ECF system, and (2) the CM/ECF system will send notification of this filing to all attorneys of record who have registered for CM/ECF updates.

*/s/ Scott R. Jacobsen*  
Scott R. Jacobsen (*admitted Pro Hac Vice*)